

**CUPA:** Napa County Department of Environmental Management

**Date of Evaluation:** April 26, 2005

**State Evaluation Team:**

**Cal/EPA Team Leader:** Dennis Karidis

**DTSC Evaluator:** Tom Asoo

**OESEvaluator:** Brian Abeel

**Please complete status report**

**Deficiencies and Corrective Actions Status Report**

1. **Deficiency:** The CUPA is not ensuring that businesses with minor violations return to compliance within 30 days from the date of the notice to comply.

**Corrective Action Status:** Supervisor reviews violation tracking documents on a monthly basis to ensure timely follow-up by staff.

**Deficiency:** The CUPA does not always allow businesses with minor violations to certify that violations have been corrected.

**CUPA Corrective Action:** Businesses with minor non-paperwork violations, not requiring a re-inspection, are directed to submit a "Return to Compliance" statement. Businesses required to submit paperwork to correct violations are directed to submit a "Return to Compliance" statement or requested paperwork, depending on the violation, to correct the violation.

3. **Deficiency:** The CUPA is not citing violations in a manner consistent with the definitions of Minor, Class II, or Class I as provided in statute and regulations.

**CUPA Corrective Action:** Training has been provided in the definition of Minor, Class II, and Class I violations. Refresher training will be provided periodically. The supervisor reviews each completed inspection report for correctness. Our inspection reports are being improved to use an electronic format and will request that each violation be properly categorized.

4. **Deficiency:** The CUPA is inspecting Hazardous Waste Generators under Business Plan thresholds on a complaint basis only.

**CUPA Corrective Action:** Hazardous waste generators under Business Plan thresholds have been added to the routine Unified Programs inspection cycle. They are inspected on a triennial basis.